

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Robert W. Smith	:	Case No: 17-02376
Renee D. Smith	:	
Debtors	:	
	:	Chapter 13
Selene Finance, LP	:	
Movant	:	
v.	:	
	:	
Robert W. Smith	:	
Renee D. Smith	:	
Respondents	:	

**DEBTORS' ANSWER TO MOVANT'S MOTION FOR RELIEF
FROM AUTOMATIC STAY**

AND NOW, come the Respondents, Robert W. Smith and Renee D. Smith, by and through their attorney, Michael R. Caum, Esquire, to file an Answer to Movant's Motion for Relief from Automatic Stay, and in support thereof, aver the following:

1. Admitted
2. Denied. Paragraph 2 states a conclusion of law to which no response is required under the Federal Rules of Bankruptcy Procedure and accordingly, all such conclusions are denied.
3. Denied. The "Note" and the "Mortgage" speaks for themselves. To the extent that Movant's characterizations of the Note and the Mortgage vary from its contents, all such characterizations are denied.
4. Denied. The "Mortgage" speaks for itself. To the extent that Movant's characterizations of the Note vary from its contents, all such characterizations are denied.
5. Denied. The "Mortgage" speaks for itself. To the extent that Movant's characterizations of the Note vary from its contents, all such characterizations are denied.

6. Denied. The “Assignment of Mortgage” speaks for itself. To the extent that Movant’s characterizations of the Assignment of Mortgage vary from its contents, all such characterizations are denied.
7. Denied. The “Debtor(s)’ Chapter 13 First Amended Plan” speaks for itself. To the extent that Movant’s characterizations of the Debtor(s)’ Chapter 13 First Amended Plan vary from its contents, all such characterizations are denied.
8. Denied. The “Mortgage” speaks for itself. To the extent that Movant’s characterizations of the Mortgage vary from its contents, all such characterizations are denied
9. Admitted.
10. Admitted.
11. Denied. Paragraph 11 states a conclusion of law to which no response is required under the Federal Rules of Bankruptcy Procedure and accordingly, all such conclusions are denied.
12. Denied. Paragraph 12 states a conclusion of law to which no response is required under the Federal Rules of Bankruptcy Procedure and accordingly, all such conclusions are denied.
13. Denied. Paragraph 13 states a conclusion of law to which no response is required under the Federal Rules of Bankruptcy Procedure and accordingly, all such conclusions are denied.
14. Denied. Paragraph 14 states a conclusion of law to which no response is required under the Federal Rules of Bankruptcy Procedure and accordingly, all such conclusions are denied.

WHEREFORE the Respondents, Robert W. Smith and Renee D. Smith, request this Honorable Court to:

- (a) Deny all relief requested in Movant's Motion; and,
- (b) Award any and all relief this Honorable Court deems just.

Respectfully Submitted,

Date: 5/10/2020

/s/ Michael R. Caum
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